

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  ENGINEERING DIVISION  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGES 7	PAGE 1
	A/N Below	DATE 11/20/12
	PROCESSED BY T. Iwata	CHECKED BY

California Specialty Painting, Inc.  
12236 Coast Drive  
Whittier, CA 90601  
ID#: 135729

**EQUIPMENT DESCRIPTION:**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 1: COATING</b>					
SPRAY COATING OPERATION, NO. 3, FLOOR TYPE, 12 FT W. X 10 FT-4 IN L. X 8 FT H., WITH TWENTY 20 X 25 IN EXHAUST FILTERS, ONE 2-HP EXHAUST FAN  A/N 543727 <del>412995</del>	D4			PM: (9) [RULE 404]; VOC: (9) [RULE 1107, 1145, 1171]	<del>A63.1</del> <u>A63.2</u> B27.1 C6.1 D322.1 E175.1 H23.1 K67.3 K67.4
SPRAY COATING OPERATION, NO. 4, FLOOR TYPE, 12 FT W. X 10 FT-4 IN L. X 8 FT H., WITH TWENTY 20 X 25 IN EXHAUST FILTERS, ONE 2-HP EXHAUST FAN  A/N 543726 <del>412985</del>	D5			PM: (9) [RULE 404]; VOC: (9) [RULE 1107, 1145, 1171]	<del>A63.1</del> <u>A63.2</u> B27.1 C6.1 D322.1 E175.1 H23.1 K67.3 K67.4
SPRAY COATING OPERATION, NO. 5, FLOOR TYPE, 12 FT W. X 10 FT-4 IN L. X 8 FT H., WITH TWENTY 20 X 25 IN EXHAUST FILTERS, ONE 2-HP EXHAUST FAN  A/N 543725 <del>412980</del>	D6			PM: (9) [RULE 404]; VOC: (9) [RULE 1107, 1136, 1145, 1171] HAP: (10) [40CFR 63 SUBPART JJ]	<del>A63.1</del> <u>A63.2</u> B27.1 C6.1 D322.1 E175.1 H23.1 K67.3 K67.4
SPRAY COATING OPERATION, NO. 2, FLOOR TYPE, 30 FT W. X 7 FT L. X 11 FT H., WITH SIXTY-FOUR 20 X 25 IN EXHAUST FILTERS, TWO 5-HP EXHAUST FAN  A/N 543728 <del>451000</del>	D8			PM: (9) [RULE 404]; VOC: (9) [RULE 1107, 1145, 1171]	<del>A63.1</del> <u>A63.2</u> B27.1 C6.1 D322.1 E175.1 H23.1 K67.3 K67.4

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SPRAY COATING OPERATION, NO. 1, FLOOR TYPE, 14 FT W. X 16 FT IN L. X 9 FT H., WITH SIXTEEN 20 X 20 IN EXHAUST FILTERS, ONE 3-HP EXHAUST FAN  A/N 543729 <del>518863</del>	D13			PM: (9) [RULE 404]; VOC: (9) [RULE 1107, 1145, 1171]	A63.2 B27.1 C6.1 D322.1 E175.1 H23.1 K67.3 K67.4
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A/N 543724: Title V permit revision application

### **CONDITIONS**

#### **A63.1 (To be removed):**

~~THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:~~

CONTAMINANT	EMISSIONS LIMIT	
VOC	LESS THAN OR EQUAL TO 52 LBS IN ANY ONE DAY	

#### **A63.2:**

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT	
VOC	LESS THAN OR EQUAL TO 39 LBS IN ANY ONE DAY	

*Added:*

**FOR THE PURPOSES OF THIS CONDITION, THE LIMIT(S) SHALL BE BASED ON THE TOTAL COMBINED EMISSIONS FROM DEVICE NOS. D4, D5, D6, D8 AND D13.**

#### **B27.1:**

THE OPERATOR SHALL NOT USE MATERIALS CONTAINING ANY COMPOUNDS IDENTIFIED IN THE SCAQMD RULE 1401, AS AMENDED 07-DEC-1990.

#### **C6.1:**

THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED, AS INDICATED BELOW, DOES NOT EXCEED 0.25 INCHES WATER COLUMN.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the exhaust filters.

The operator shall record the parameter being monitored once every 7 days.

#### **D322.1**

THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA, AND IMPROPERLY INSTALLED FILTER MEDIA.

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#### **E175.1**

THE OPERATOR SHALL NOT USE THIS EQUIPMENT UNLESS ALL EXHAUST AIR PASSES THROUGH THE FOLLOWING:

Filter media at least 2 inches thick.

#### **H23.1**

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
VOC	DISTRICT RULE	109
PM	DISTRICT RULE	481

#### **K67.3**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

Date, time and description of repairs made.

Name of the person conducting inspection and maintenance of the filter media.

Date, time and results of inspection.

#### **K67.4:**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

VOC emissions for this equipment in lbs/day and VOC content as applied, including water and exempt solvents of all coatings and solvents.

### **BACKGROUND:**

California Specialty Painting submitted application nos. 543725-543729 to change conditions on permits for five spray booths. Currently, four of the spray booths (device nos. D4, D5, D6 and D8) are each limited to 52 lb/day of VOC emissions (condition no. A63.1), while the fifth spray booth (device no. D13) is limited to 39 lb/day (condition no. A63.2). California Specialty Painting is requesting that all five spray booths be limited to a combined 39 lb/day. The company is requesting this BACT limit so that when the company relocates in 2013, compliance with BACT will be achieved. Condition no. A63.2 will be modified to include all five spray booths (device nos. D4, D5, D6, D8 and D13) and condition no. A63.1 will be deleted from devices nos. D4, D5, D6 and D8. The company also operates under a facility-wide VOC emission limit of 128 lb/day. No changes to this limit will be made at this time.

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**Condition no. A63.2:**

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 39 LBS IN ANY ONE DAY

VOC	LESS THAN OR EQUAL TO 39 LBS IN ANY ONE DAY
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Add:

**FOR THE PURPOSES OF THIS CONDITION, THE LIMIT(S) SHALL BE BASED ON THE TOTAL COMBINED EMISSIONS FROM DEVICE NOS. D4, D5, D6, D8 AND D13.**

**Condition no. A63.1 (Removed):**

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 52 LBS IN ANY ONE DAY

VOC	LESS THAN OR EQUAL TO 52 LBS IN ANY ONE DAY
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California Specialty Painting is a Title V facility. A Title V renewal permit was issued to this facility on July 26, 2011. California Specialty Painting has proposed to revise their Title V renewal permit by changing permit conditions for device nos. D4, D5, D6, D8 and D13. This permit revision is considered as a “minor permit revision” to the renewal Title V permit, as described in the Regulation XXX evaluation.

**PROCESS DESCRIPTION:**

California Specialty Painting paints metal and plastic products for military and aerospace companies. In the past, they additionally painted wood items. The company received one NC and one NOV in the last two years. The NC was issued to provide VOC emission recordkeeping forms and the NOV was issued for failure to submit 500 SAM and 500 ACC forms. The facility is currently operating in compliance.

**EMISSION CALCULATIONS:**

The spray booths will be operated as before but below a lower daily VOC emission limit. VOC emissions per booth are divided equally. The company operates 8 hr/day, 5 day/wk and 50 wk/yr

VOC Emissions:

Daily = 39 lb/day ÷ 5 booths = 7.8 lb/day/booth

Hourly = 7.8 lb/day ÷ 8 hr/day = 0.98 lb/hr/booth

PM10 Emissions:

The most widely used coating by California Specialty Painting is an acrylic primer (10 gal/day max, 5 gal/day ave). PM10 emission estimates are based on use of this coating. Emissions are equally distributed among all five booths.

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Coating: White acrylic 2K primer

Density: 10.99 lb/gal

Solids Wt. %: 65.6

Usage: 10 gal/day (per company)

Transfer efficiency: 65%

Filter efficiency: 90:

$R1 \text{ per booth} = 2 \text{ gal/day} * 10.99 \text{ lb/gal} * 0.656 * (1 - 0.65) \div 8 \text{ hr/day} = 0.63 \text{ lb/hr (5 lb/day)}$

$R2 \text{ per booth} = 0.63 \text{ lb/hr} * (1 - 0.9) = 0.063 \text{ lb/hr (0.5 lb/day)}$

### **RULE ANALYSIS:**

RULE 212 (c)(1): This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school. A public notice is not required since the closet school (South El Monte High School) is located over 3,000 feet (0.6 mile) from the facility.

RULE 212 (c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g). There will not be an increase in emissions from the facility. The facility will still operate under the existing facility-wide VOC cap. Public notice not required by this section.

RULE 212(c)(3): This section requires a public notice for any new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will not result in an increase of toxic emissions or cancer risk. Public Notice is not required under this section of the rule.

RULE 212 (g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums specified by Rule 212(g).

A public notice is not required for this project since there will not be an increase in emissions from any equipment.

RULES 401 & 402: AQMD database has no records of visible emissions or nuisance complaints against this facility. Compliance with these requirements is expected with the proper operation of the equipment.

RULES 1107, 1136, 1145 and 1171: Continued compliance with these applicable rules is expected since the spray booths will be operated without any material or spray applicator changes. Based on the most recent inspector's report, the facility was using compliant coatings and solvents.

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RULE 1303(a): There will not be an emission increase with these applications. VOC emissions from all five spray booths will now be limited to a combined 39 lb/day. BACT is not triggered.

RULE 1303(b)(1): Modeling for PM10 is not required since there is no increase in emissions. Also, the hourly emissions are less than the allowable limit.

Modeling Analysis	PM10 (lb/hr)
Hourly Emissions	0.063
Allowable Limit	0.41

RULE 1303(b)(2): Emission offsets are not required, no emission increase.

RULE 1303(b)(4): The facility is expected to be in full compliance with all applicable rules and regulations of the District.

RULE 1401: There will not be an increase in toxic air contaminants from these applications therefore this project is exempt under Rule 1401 (g)(1)(B), modification with no increase in risk.

### **REGULATION XXX:**

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(15)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(15)(A)(vi).

This proposed project is the 1<sup>st</sup> permit revision to the Title V renewal permit issued to this facility on 7/26/2011. The following table summarizes the permit revisions:

Revision	HAP	VOC	NO <sub>x</sub>	PM10	SO <sub>x</sub>	CO
1 <sup>st</sup> Permit Revision: Change of conditions for device nos. D4, D5, D6, D8 and D13	0	0	0	0	0	0
Cumulative Emissions Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

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## **RECOMMENDATION**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to the EPA for a 45-day review pursuant to Rule 3003(j). If the EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.

*California specialty painting – sb change of conditions*